

The Superior Court of King County

Judith H. Ramseyer, Judge
King County Courthouse - Seattle
516 Third Avenue
Seattle, Washington 98104

(206) 477-1605
ramseyer.court@kingcounty.gov

TRIAL PROCEDURES IN DEPARTMENT 46

Please review these procedures, prepared to promote a smooth and efficient trial.

A. Estimate of Trial Length

1. Trial typically is conducted Monday –Thursday, 9:00 a.m. - 4:00 p.m. With breaks, plan on five (5) hours of trial time per day
2. Before trial begins, the court will review with counsel all witnesses expected to testify. For trials estimated to be more than four (4) days, the parties shall work together to complete and submit a Witness Examination Time Form no later than five (5) court days before trial.

B. Witnesses

1. Plan for your witnesses to fill the entire court day.
2. Call witnesses promptly; do not engage in discussions outside the courtroom that delay court proceedings.
3. Advise your witnesses of orders *in limine* that affect or limit their testimony.
4. Witness examination is limited to direct, cross, redirect, and recross.
5. Be prepared at the end of each trial day to advise the parties and the court of witnesses you intend to call the following day.

C. The Jury

1. Do not directly interact with or speak to the jury during the course of the trial (except during opening statement and closing argument) and advise your witnesses of this instruction.
2. If you wish to publish an exhibit or show something to the jury, ask the court's permission before doing so.

D. Court Orders

1. If you believe the “door has been opened” on a subject that previously has been ruled upon, first raise the issue with the court outside the presence of the jury. Do not make a unilateral determination the order no longer is in effect.

E. Form of Objection

1. Stand when you object and state the succinct basis of your objection, *e.g.*, irrelevant, hearsay, asked and answered, and so forth.
2. Do not make “speaking” objections.
3. Wait for a ruling on an objection. If you agree with the objection, state that you will withdraw or rephrase the question.
4. Do not interrupt or speak over others who are speaking, and advise your witnesses of this instruction.

F. Interaction Between Counsel and the Judge

1. The court will not conduct sidebar conferences. If you have issues that must be raised outside of the presence of the jury, notify the clerk or the bailiff so the issue may be addressed on the record before or after the jury is present.
2. Address your comments to the court, not to one another.

G. Use of Courtroom

1. You may move around the courtroom when examining witnesses, but do not approach the witness without the court’s permission.
2. When court recesses at lunch and at the end of day, please leave the courtroom as quickly as possible. Court staff cannot leave the courtroom unattended, and they have other responsibilities outside the courtroom.

H. Exhibits

1. If possible, address the admissibility of problematic exhibits pretrial.
2. Absent agreement by the parties, illustrative exhibits will not go to the jury room.
3. Redact personal identifying information such as all but the last four digits of bank accounts and Social Security numbers.

I. Closing Argument

1. Do not allude to any matter that has not been admitted into evidence.
2. Do not assert personal knowledge of facts.
3. Do not state a personal opinion regarding the justness of a cause, the credibility of a witness, the culpability of a civil litigant, or the guilt or innocence of a criminal defendant. You may argue based on your analysis of the evidence for any position or conclusion regarding these matters.
4. Do not ask the jurors to put themselves in the position of your client.
5. Do not refer to similar cases and the amount of damages awarded in those cases during closing argument.

Thank you for your preparation and cooperation.